

U.S. Department of Housing and Urban Development (HUD)  
Office of Healthy Homes and Lead Hazard Control (OHHLHC)

# FY13 Grantee Program Managers School

## *Laying the Foundation and Putting It All Together*





BACK TO  
SCHOOL



















# POP QUIZ

- What is the first thing on your to do list when starting a lead inspection?



# ANSWER





# To Test or not To Test

## That is NOT the Question



## Chapter 7 Lead Based Paint Inspection

Emphasizes that results and LBP inspection / RA reports using an XRF without a current Performance Characteristic Sheet are invalid

Updates recommended report summary paragraphs on disclosing where LBP was, and was not, identified





# HOW TO DO IT



# HOW TO DO IT

1. Obtain a current PCS sheet for your XRF
2. Establish a routine
3. Conduct Visual Assessment
4. Draw a site plan





# HOW TO DO IT

## POP QUIZ

**How many calibrations shots should you take before you begin testing?**

**How often should you recalibrate during testing?**



# HOW TO DO IT

**ANSWER**





# HOW TO DO IT

5. Identify Testing Combinations
6. Test All Components per Guidelines and Program Policy
7. Collect Dust Samples
8. Collect Soil Samples



# HOW TO DO IT

## POP QUIZ

**When testing a single family house, what do you do when an XRF result shows inconclusive?**



# HOW TO DO IT

## ANSWER

Follow up question: Why do you not use the same process for multi-family properties?



# HOW TO DO IT

**ANSWER**





# HOW TO DO IT

8. Take pictures
  - Exterior and interior spaces
  - All untested windows and other untested components
9. Download Test Results from the XRF
10. Write the Inspection Report



# HOW TO DO IT

The inspector will prepare an inspection report indicating if and where lead-based paint is located in the unit or the housing development (or building).

Inspection reports contain detailed information on the following:

- ◆ Who performed the inspection;
- ◆ Date(s);
- ◆ Inspector's certification number;
- ◆ All XRF readings;
- ◆ Classification of all surfaces into positive or negative (but not inconclusive) categories, based on XRF and laboratory analyses;
- ◆ Specific information on the XRF and laboratory methodologies;
- ◆ Housing unit and sampling location identifiers;
- ◆ Results of any laboratory analyses.



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# LIRA FAQ SHEET

- All Inspectors and Assessors **MUST** be **certified**.
- Must possess a **current PCS** for your XRF.
- Must conduct a **Visual Assessment** prior to testing.
- Must include a **site plan**.
- Must test at **least 1 window per room**, more if windows change in any way.
- The entire **exterior of a house** is NOT a room equivalent.
- Must take **pictures of windows** - Pictures **MUST** be clear and show window condition.
- Must take **pictures of interior and exterior spaces**.
- Must take **soil samples** if bare dirt exists within the drip line or in a child's play area.
- Must take dust wipes
- **DOCUMENT, DOCUMENT, DOCUMENT**





# Chapter 5 Risk Assessments for OHHLHC Grantees

- Purpose
- Required Activities
- Required Documentation- **LI and RA REPORT**
  - Required Elements
  - Who receives it to use, How it is used, When is it used
- How to avoid incomplete and invalid LI/RA Reports
- **PGI-2013-01**
- Templates



# Chapter 5 Risk Assessments for OHHLHC Grantees

- Purpose:
  - Determine the existence, nature, severity, and location of lead based paint hazards in or on a residential property and for reporting the findings of the assessment and the options for controlling or abating the hazards that are found
  - HUD Guidelines Chapter 5-9  
[http://portal.hud.gov/hudportal/documents/hudoc?id=ch05\\_12-13-12.pdf](http://portal.hud.gov/hudportal/documents/hudoc?id=ch05_12-13-12.pdf)



# FULL Lead Inspection AND Risk Assessment is required for:

## **ALL LHRD, LHC and HH Grants:**

- Every owner occupied single family residence
- Every rental occupied single family residence
- Every vacant/rental single family residence
- Every multifamily dwelling of 4 or less attached/detached residential units
- Every multifamily dwelling of 5 or more must use the sampling method for FULL assessments as stated in:
  - Chapter 5 of HUD Guidelines:
    - Page 5-64



# Why are OHHLHC Grant requirements for LI/RA different from other HUD programs?

- Intent and mission is to remove lead based paint hazards
- Require a *Full LI AND RA*
  - *NO Partial, Screens, EBL, OR LI only/RA only*
- **NO ASSUMPTIONS!**
- Specific purpose of OHHLHC Lead funds
  - Identify and remediate ALL Lead Based Paint Hazards
  - Not Rehab – Not Code Compliance – Not Home Improvement





# Chapter 5 Risk Assessments for OHHLHC Grantees

- Required Activities
- Data Collection
  - Questionnaires/Interview with the occupants
  - Floor Plan and Site Plan Sketches
  - Building Condition Inspection FORM5.1
  - Visual Assessment
  - Dust Sampling
  - Paint Testing- Covered in Lead Inspection
  - Soil Sampling
- Interpretation of results
- Reporting



# Required Activities for RA

- **Data Collection**

- **Questionnaire** Form 5. 0

- [http://portal.hud.gov/hudportal/documents/huddoc?id=cho5\\_12-13-12.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=cho5_12-13-12.pdf)
    - *Identifies patterns of use for the unit, additional sources of lead coming into home that may impact results, history of blood lead for children under 6 to consider.*



# Required Activities for RA

- Data Collection
  - ***Floor Plan***-Inside of unit
    - Each unit
      - Labeled with each room, space, and walls Required
        - Recommended: #Windows, Dust Sample Sites
    - Be consistent with labeling on all forms from XRF testing, sketch, recommendations and scope



# Required Activities for RA

- Data Collection
  - ***Site Sketch***- Outside of unit
    - Shows outline of property, building, other structures including fences, driveways and adjacent streets.
      - DIRECTIONAL ARROWS (N,S,E,W)
      - Locations of exterior deteriorated paint, bare soil
      - Exterior sampling for soil and paint





# Required Activities for RA

- **Building Condition Inspection FORM 5.1**
  - Record all findings on Form 5.1
    - Meets EPA (40 CFR 745.227 ( c ) and (d)
  - NOT the same or equivalent to visual assessment

5-20



# Required Activities for RA

- **Visual Assessment**

- Locate lead based paint hazards both exterior and interior
  - All rooms
    - Common Areas- Adjacent to sampled units
    - Common Areas- Likely <6 old come in contact with
  - Complete inventory of location & approximate size of each instance of:
    - Deteriorated substrate conditions
    - Bare Soil

5-(19-22)



# Required Activities for RA

- **Documentation of Visual Assessment Findings**
  - Side and Wall identification
    - Side of structure with letters
      - Side A street side, Multi family Side A Main Entry
  - Room equivalent Identification
    - Both a number and its use
      - Room 5, Kitchen
        - Page 38- Spaces considered rooms: Hallways, stairways, entry rooms, lobbies, bedroom bathrooms living rooms, kitchens, ect
  - Sides in a room
    - Designated Clockwise
      - If facing side C than side A at your back
  - Component identification- *Table 5.4 resource*
    - Window, Room 1, Side C, #1
- 5-23



# Required Activities for RA

- **VISUAL ASSESSMENT DOCUMENTATION**
- Only two responses to document for OHHLHC!
  - **Intact**
  - **Deteriorated**
    - IF XRF Test for LBP is  $>$  Action Level = **ELIGIBLE**



# Required Activities for RA

- **Dust Sampling**

- Must be collected in all living areas where young children are most likely to come into contact with dust (40CFR 745.227 (d)(5)
  - Sill and Floor from each of such rooms
- Figure 5.15 Page 5-43 Resource
- NO MIN, NO MAX- Must be a representative Sample per the RA judgment

- **NO TROUGHS-CLEARANCE ONLY**





# Required Activities for RA

- **Paint Testing**

- **MUST HAVE XRF TESTING OF ALL PAINTED COMPONENTS**
  - **May do room equivalents if documented as required**
- **NO Exceptions, NO instances in which XRF testing is not required in an OHHLHC unit**
- *Details Reviewed the Lead Inspection Slides*



# Chapter 5 Risk Assessments for OHHLHC Grantees

- Required Documentation- **LIRA REPORT**
  - Required Elements
  - Who receives it to use, How it is used, When is it used
  - What is not to be included in the REPORT



# LIRA REPORT

- **Required Elements**

Summarize these elements into the required format sections:

- Site Specific Hazard Control Options
- Cost and Feasibility
- Reevaluation Recommendation
- Recommendation to Owners When No Hazards Are Identified
- *Some may be repeated more than once*



# LIRA REPORT

- Required Elements
  - **Report Format**
    - Executive Summary
    - Table of Contents
    - Identifying Information and RA Signature (**EPA REQUIRED**)
    - Purpose of THIS Risk Assessment
    - Definitions
    - Description of LBP Hazards and Acceptable Hazard Control Options (**EPA- Required**)
    - Recommendations for Maintenance for Management (**EPA- Required**)
    - Supporting Information (**EPA- Required**)



# LIRA REPORT

- **Who receives it to use & How**
- Homeowner
  - Guide of how to make home lead safe, disclosure tool for future owner, occupants
- Occupant
  - Risk of unit they are living in summarized, options for safe removal and management of the findings
- Lead Regulating Agency
  - Official documentation of lead found for this unit, at this time, by whom. REPORTING of Lead Burden, Monitoring of Housing Stock, Disclosure for Public Record



# LIRA REPORT

- **Who receives it to use & How**
- OHHLHC Grant Program
  - Determines eligibility of units if any LBP Hazards are identified
  - Provides blueprint and justification for scope of work
  - Provides justification documentation for any components included that was not identified as a LBP Hazard:
    - Supporting structural
    - Room Equivalent Testing





# LIRA REPORT

- **Who receives it to use & How**
- **OHHLHC GTR & OIG**
  - Use the LIRA to establish eligible cost of all scoped items
  - Validation of LIRA
    - Time
    - All required Components per strictest standard in your jurisdiction
      - 40 CFR, HUD Guideline, State Regs, PG, NOFA



# LIRA REPORT

- **What is not to be included in the REPORT**
  - Any health or personal information not related to the unit patter of use
  - Name of EBL or children living in the home but included in questionnaire
  - Scope of Work (should be developed based on the LI and RA report!)
  - Tubs and Tile



# How to avoid incomplete and invalid LIRA Reports

- ▣ Validation of LIRA

- Time

- 6month to 1 year ***Recommend Reevaluation before contract***

- 1 year and 1 day = **INVALID, Unit if contracted is ineligible in whole for reimbursement.**

- ▣ 24 CFR 35.165(b)(1)

- All required Components in the final filed report; that reflect compliance of activities completed per strictest standard in your jurisdiction

- 40 CFR, HUD Guideline, State Regs, PG, NOFA



# Chapter 5 Risk Assessments for OHHLHC Grantees

- Templates
  - Provide to Sub and Contractor to guide compliance
  - Optional but beneficial
    - Located in Tab



# MYTH BUSTERS!

- *Friction & Impact- Indicate a LBP Hazard that makes those components eligible for LHC funds provided by OHHLHC in whole – FALSE*
  - *These terms describe a **potential hazard** based on the patterns of use of the unit.*
  - ***If** these components are not confirmed by a positive lead dust sample **and** are also LBP + for the component by XRF, they **are not currently hazards** and are **not eligible**.*
  - *ROOM EQUIVALENCY*
    - *Must be defined and identified in the report 5-(30-32)*



# MYTH BUSTERS!

- Chewable Surface
- **ALL APPLY FOR FRICTION AND IMPACT**
  - Optional for treatment
    - If yes, than must have thorough documentation of the location and justification for repair
  - Must Comply with EPA
  - Must be soft surface
  - If child not present in the home are not hazardous
    - NO VACANT UNITS





# PGI-2013-01

- **Requirements**
- **Documentation**
- **What does it mean for grant programs**



# ACTIVITY

- Which one of answer below is a required element of a LIRA Report according to the HUD GUIDELINES 2012
  - Visual Inspection of all surface coating in the unit
  - Risk Assessor Signature
  - Material Safety Data Sheet
  - ALL lab and sample results
  - Summary of Hazards found with recommendations for LHC



# Activity

- Which answer below is not a required element of a LIRA? IS there more than one?
  - Questionnaire/survey of occupants
  - Building Component Survey
  - Floor Plan Sketch
  - OHHLHC Grant Program Scope of Work
  - Site Sketch
  - Requirement for Disclosure Statement

